

UNITED STATES DISTRICT COURT

for the

Eastern District of Pennsylvania

United States of America)

v.)

MARSHALL BROOKS)

Case No. *19-077-M*- - - - -
Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of DECEMBER 14, 2018 in the county of BUCKS in the
EASTERN District of PENNSYLVANIA, the defendant(s) violated:

Code Section

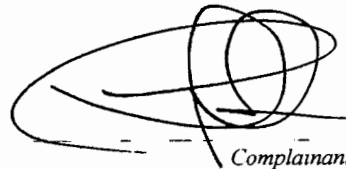
18 U S C § 2113(a)

Offense Description

KNOWINGLY AND UNLAWFULLY BY FORCE AND VIOLENCE, AND BY INTIMIDATION, TOOK, FROM EMPLOYEES OF THE FIRST BANK, LAWFUL CURRENCY OF THE UNITED STATES, THAT IS APPROXIMATELY \$5,400 BELONGING TO, AND IN THE CARE, CUSTODY, CONTROL, MANAGEMENT, AND POSSESSION OF THE FIRST BANK, THE DEPOSITS OF WHICH WERE INSURED BY THE FEDERAL DEPOSIT INSURANCE CORPORATION

This criminal complaint is based on these facts:

PLEASE REFER TO ATTACHED AFFIDAVIT IN SUPPORT OF ARREST WARRANT.

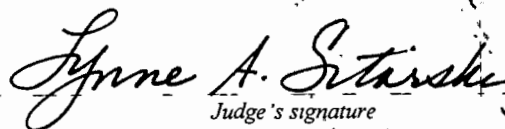
☒ Continued on the attached sheet.

Complainant's signature

THOMAS JACKSON, FBI TASK FORCE OFFICER

Printed name and title

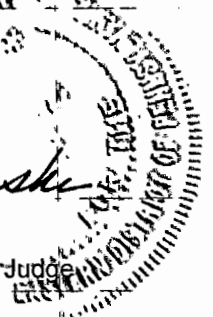
Sworn to before me and signed in my presence.

Date: 4/19/2019City and state: Philadelphia, Pennsylvania

Judge's signature

Lynne A Sitarski, Magistrate Judge

Printed name and title



AFFIDAVIT OF PROBABLE CAUSE

I, Thomas Jackson, Task Force Officer, Federal Bureau of Investigation ("FBI"), Philadelphia, Pennsylvania, being duly sworn, state:

A. INTRODUCTION

1. I have been a sworn Law Enforcement Officer with Bensalem Township for over 20 years and am currently a Task Force Officer (TFO) with the F.B.I. BucksMont Safe Streets Task Force. Throughout my career, I have attended many courses involving the investigation of various crimes. These courses have been sponsored by the Bucks County Police Training Center, Pennsylvania State Police, Bucks County Community College, Public Agency Training Center (PATC), Mercer County (New Jersey) Police Academy, Sirchie Education and Training, Law Enforcement Advanced Development (L.E.A.D. Consultants), Atlantic County (NJ) Chiefs of Police Association, Middle Atlantic-Great Lakes Organized Crime Law Enforcement Network (MAGLOCLN), and the Abington Township Public Training Program. During my tenure as a Detective and TFO, I have investigated numerous robberies, burglaries, arsons, thefts, firearms violations, drug violations, and other related crimes, which have resulted in approximately 600 arrests and hundreds of convictions.

2. I have personally participated in the investigation set forth below. I am familiar with the facts and circumstances of the investigation through my personal participation; from discussions with other special agents of FBI and other law enforcement; from my discussions with witnesses involved in the investigation; and from my review of records and reports relating to the investigation. The identities of all witnesses are known to police, however, for the purpose of this Affidavit their names will not be revealed. Not every witness's observations are included. Through the use of various investigative techniques, including but not limited to interviews,

physical surveillance, video forensics and search warrants, I believe Marshall Brooks committed multiple bank robberies since December 2018. I supply here only the facts necessary to establish probable cause to arrest Marshall Brooks for one armed robbery.

3. Marshall Brooks is a white male with a date of birth of July 6, 1965. He has light grey/partially grey hair, facial hair, blue eyes, and is approximately 5'10 and weighs 190 pounds. Marshall Brooks was convicted for a bank robbery in Delaware County, Pennsylvania in 2004. In that previous robbery, Brooks used a pellet gun to commit the crime.

B. PROBABLE CAUSE

4. On Friday, December 14, 2018 at approximately 5:15 p.m. the First Bank located at 4956 Old Street Road in Trevoise, Pennsylvania in Bucks County, was robbed by a subject brandishing a black handgun. The robber was described as white male, approximately 5'8, wearing all dark clothing with a hoodie and black ski mask which covered the lower part of his face. The robber entered an employee's cubicle and ordered the employee to come to him. The subject then physically held the employee, hereafter identified as Victim #1, and brought her over to the teller window which was being operated by a different bank employee. While still holding Victim #1, the actor pointed the firearm to Victim #1's throat/chest area and ordered the teller to give him all the money minus the dye pack and bait money. The teller complied and gave the robber approximately \$5,400. The robber then fled the bank. At the time of the robbery, the deposits of the First Bank were insured by the Federal Deposit Insurance Corporation.

5. Law enforcement canvassed the neighborhood after the bank robbery. Law enforcement interviewed a neighbor who had contact with a white male, approximately 40 - 50 years of age, with light/blonde hair and facial hair, that evening. The neighbor lives within walking

distance of the First Bank. The neighbor reported that the subject had parked in front of the neighbor's residence in way that blocked the driveway. The neighbor asked him to move his car and the subject complied. The subject's car was described as an older model, red or maroon vehicle which looked similar to a Saturn sedan. The subject returned to the vehicle at approximately 5:15 p.m. The neighbor advised that the subject was carrying a bag when he returned to the vehicle. The neighbor observed the subject walking in the middle of the road on his way back. When another car came down the street at the same time, the subject jumped out of the way and behind a truck. The neighbor further reported that in the process the subject had dropped his hat near the truck and it remained behind. This hat was recovered by law enforcement. It is described to a black wool ski mask with a hole in it. I swabbed the knit hat for DNA and submitted it to the Bode Cellmark Forensics Lab for analysis.

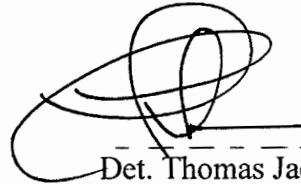
5. I reviewed the video surveillance taken of the First Bank robbery. I noted that the robber appears to be wearing a black ski mask which covers the lower part of his face, but his eyes and nose are visible. The black ski mask recovered from behind the truck appears similar to the one used by the robber. Surveillance of the front parking lot shows the robber holding a satchel bag.

6. On February 15, 2019, Marshall Brooks was interviewed by Bensalem Police. Brooks was advised of and waived his *Miranda* rights. During a recorded interview, Brooks confessed to committing six armed robberies since December 2018, to include the robbery of the First Bank. Brooks claimed he used a black pellet gun, but made it "look real." Brooks also admitted to driving a red Chevrolet Cobalt during the First Bank robbery. I am familiar with the Chevrolet Cobalt and it is similar in appearance to a Saturn.

7. I obtained the results from the DNA analysis which concluded that the DNA

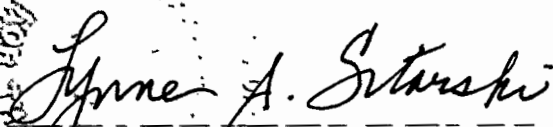
recovered from the inside and outside of the ski mask matched the DNA of Brooks.

8. Based on the above facts, I submit there is probable cause to believe that Marshall Brooks committed a bank robbery of the First Bank, located at 4956 Old Street Road in Trevoise, PA, on December 14, 2018, in violation of Title 18, United States Code, Section 2113(a) and as such a warrant should be issued for the arrest of Marshall Brooks.



Det. Thomas Jackson
Task Force Officer
Federal Bureau of Investigation

Sworn to before me
this 19th day of April, 2019


HONORABLE LYNNE A. SITARSKI
United States Magistrate Judge